

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability Litigation	MDL NO. 2:15-md-02641-PHX-DGC STIPULATION OF DISMISSAL WITHOUT PREJUDICE
This document relates to the cases listed on the Exhibit attached hereto.	

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Plaintiffs whose cases are listed on Exhibit A attached hereto (“Plaintiffs”) and Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. (“Defendants”), and file this Stipulation of Dismissal without Prejudice, and in support thereof, respectfully show the Court as follows:

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and Defendants hereby stipulate to the dismissal of the cases listed on Exhibit A without prejudice to the re-filing of same. Plaintiffs and Defendants further stipulate that they are to bear their own costs.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby respectfully request that the Court dismiss the cases listed on Exhibit A in their entirety without prejudice to the re-filing of same and order that these parties are to bear their own costs.

Respectfully Submitted,

s/ David P. Matthews
David P. Matthews
dmatthews@thematthewslawfirm.com
MATTHEWS & ASSOCIATES
2509 Sackett St.
Houston, TX 77098
P: 713.522.5250
F: 713.535.7184

ATTORNEY FOR PLAINTIFFS

s/ Richard B. North, Jr.
Richard B. North, Jr.
richard.north@nelsonmullins.com
NELSON MULLINS RILEY &
SCARBOROUGH LLP
201 17th St. NW, Ste. 1700
Atlanta, GA 30363
P: 404.322.6000
F: 404.332.6397

ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on November 27, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

s/ David P. Matthews
David P. Matthews

EXHIBIT "A"

Member Case Number	Full Name of Plaintiff	Date Answer or Notice of Appearance Filed (If applicable)
2:18-cv-03506-DGC	Richard Cannon	12/18/2018
2:17-cv-04387-DGC	Franklin Conner	1/16/2018
2:18-cv-03628-DGC	Awillda Dawson	12/21/2018
2:18-cv-02782-DGC	Michael Demotte	9/20/2018
2:17-cv-04498-DGC	Sharon Dixon	1/19/2018
2:18-cv-03737-DGC	Randy Dorff	12/14/2018
2:17-cv-04425-DGC	James Grant	1/16/2018
2:16-cv-01581-DGC	Gary Hamilton	6/16/2016
2:18-cv-04385-DGC	Derek Koonce	not served
2:18-cv-04447-DGC	Albert Morgan	not served
2:18-cv-03991-DGC	Jimmie Scrivner	not served
2:16-cv-00816-DGC	John Turner	4/4/2016
2:18-cv-04010-DGC	Antoninette Siciliano	not served
2:18-cv-02859	Carmel DaSilvia	9/19/2018